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Attn: Mr. Randy Matty, P.E.
Wisconsin Department of Natural Resources
Northeast Region Headquarters
2984 Shawano Avenue
Green Bay, WI 54313-6727

February 12, 2015

Subject: 2014 Annual Power Plant Air Operation Permit Compliance Certification

Dear Mr. Matty:

Permit condition I.ZZZ.7.b.(2) of Manitowoc Public Utilities' operation permit #: 436035930-P23 requires MPU to submit an **annual certification of compliance** covering the period of January 1, 2014 to December 31, 2014. This report is to be submitted within 60 days after the end of the monitoring period. We are also required to submit the report to:

Compliance Data – Wisconsin
Air and Radiation Division
US EPA
77 West Jackson Blvd.
Chicago, Illinois 60604

The following significant events occurred during this monitoring period:

- EPA CAIR and Acid Rain Program (ARP) annual SO₂ reconciliation reports for compliance year 2013 received March 3, 2014 with sufficient allowances available for compliance.
- EPA CAIR NO_x annual reconciliation report for compliance year 2013 received March 3, 2014 with sufficient allowances available for compliance.
- Submitted and certified the 2013 eGGRT report with EPA on March 5, 2014.
- Filed request with the WDNR for new source CAIR allowance for unit 9 on April 9, 2014.
- The Part 75 and Part 60 Relative Accuracy Test Audit (RATA) performed on the SO₂/NO_x/CO₂/CO/Flow CEM system installed in the S20 Stack on July 29, 2014.

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- The Part 75 and Part 60 Relative Accuracy Test Audit (RATA) performed on the SO2/NOx/CO2/CO/Flow CEM system installed in the breaching of boiler B09 July 30, 2014.
 - Total Particulate Compliance Tests performed on Boiler B28 on September 9, 2014 and on Boiler B09 on September 10, 2014 with emissions in compliance with applicable limits.
 - Completed Method 30B mercury stack testing of boiler B09 for 30 operating days from August 6, through September 10, 2014. Boiler B09 qualifies as a mercury Low Emission Electric generating unit (LEE) under the MATS regulation.
 - Certified the new S10 and S20 COMs on September 15, 2014.
 - The WDNR issued operating permit#: 436035930-P23 on September 23, 2014.
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- EPA CAIR NOx ozone reconciliation report for compliance year 2014 received December 2, 2014 with sufficient allowances available for compliance.
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- Filed request for the Boiler B09 MATS compliance date extension on December 18, 2014.
 - Quarterly excess emission reports filed on April 22, 2014 (Q1), July 28, 2014 (Q2), October 22, 2014 (Q3) and on January 19, 2015 (Q4).
 - Semi-annual reports filed on August 22, 2014 for the first half and February 22, 2015 for the second.

Please find enclosed the 2014 Air Operation Permit Compliance Certification for the Power Plant. We believe this report contains all the information you need to evaluate MPU's compliance status. However, if you need additional information or have any questions about this report or its contents, please don't hesitate to contact Mr. Brian Fassbender of my staff at (920) 686-4211.

Sincerely,

Nilaksh Kothari

Nilaksh Kothari, P.E.
General Manager

cc. Red Jones - (MPU) w/attachments
Don Duenkel - (MPU) w/attachments
Brian Fassbender - (MPU) w/attachments
Tom Reed - (MPU) w/attachments
Scott Karbon - (MPU) w/attachments

Compliance Data – Wisconsin
Air and Radiation Division
US EPA
77 West Jackson Blvd.
Chicago, Illinois 60604

Source: Y:\Group File Folders\Reed\MPU Environmental\Environmental Reports\Annual - Compl Cert\Power Plant\Ann_compl cert 2014.docx

Air Operation Permit Compliance Certification
Form 4530-170 (R 10/10)

Notice: Under ss. NR 407.09(4)(a)3. and 439.03(1)(c), Wis. Adm. Code, all sources issued an air operation permit by the Wisconsin Department of Natural Resources must submit an annual (or more frequent) certification of compliance with all operation permit terms and conditions over the reporting period specified in the permit. You may use this form to submit your compliance certification to the Department, and to EPA Region V. Please note that compliance certifications must be signed by a responsible official, as defined in NR 400.02(136), Wis. Adm. Code. Please retain records and all other material information used to certify compliance with your air operation permit for Department review. Use of this Form is voluntary. Personally identifiable information collected on this Form is unlikely to be used for any purpose other than that for which it was originally collected, but may be provided to requesters as required by Wisconsin's Open Records law (ss. 19.31-19.39, Wis. Stats.).

A.) Facility Information

1) Facility Name **Manitowoc Public Utilities**

2) FID: **436035930**

3) a. Permit Number **436035930-P23**

b. Permit Issue Date **September 23, 2014**

4) Reporting Period Covered by this Certification **January 1, 2014 through December 31, 2014**

5) FOR PART-70 SOURCES ONLY:

All Part-70 sources must also submit a copy of the compliance certification to the **US EPA-Region V**, in addition to the **appropriate WDNR regional field office**. Addresses are listed in your Part-70 air permit. Please check the following box, if applicable to your facility:

☒ A copy of the Compliance Certification has been submitted to US EPA-Region V.

B.) Facility Compliance Information

6) Check either (a) "CONTINUOUS COMPLIANCE" or (b) "INTERMITTENT COMPLIANCE" below
(Terms "continuous" and "intermittent" compliance are defined in Instructions, page 3 of 4).

a) X **Facility Was in Continuous Compliance** (During the entire reporting period identified in this compliance certification, this facility was in **continuous** compliance with **all** conditions specified in the permit identified in this compliance certification. The method used to determine compliance for each condition is the method specified in the permit identified in this compliance certification)

b) **Facility Was in Intermittent Compliance** (During the entire reporting period identified in this compliance certification, this facility was in continuous compliance with **all** conditions specified in the permit identified in this compliance certification, **EXCEPT** for the deviations identified on the attached deviation report. The method used to determine compliance for each condition is the method specified in the permit identified in this compliance certification, unless otherwise indicated and described in the enclosed deviation report.)

NOTE: If you select this option, you must complete and attach the Air Operation Permit Deviation Summary Report, in which you list deviations from any conditions of the permit for the reporting period covered by this Compliance Certification.

Air Operation Permit Compliance Certification

Form 4530-170 (R 10/10)

C.) Alternative Permit Requirements

In certain circumstances where the underlying applicable requirement allows, permits may include a choice of limits and/or standards, alternate operating scenarios, alternate monitoring methods, alternate recordkeeping, and the like. Where the permit includes such options or alternate requirements, the source must specifically identify the permit terms and conditions which applied over the entire reporting period. Many federal MACT standards provide a choice of emission standards and associated monitoring requirements. For example, the pulp and paper MACT (40 CFR part 63 subpart S) requires certain control devices to either reduce total hazardous air pollutant emissions by weight, or by volume, or through the use of a thermal oxidizer operating under certain parameters, or through other specified means.

7) If the facility operated under alternative permit requirements for all or part of the reporting period covered by this compliance certification, please identify the permit condition that describes the alternative permit requirements, list the emission unit operated according to these requirements, and list the begin and end dates during which the emission unit was operated according to these requirements: (Add additional pages if necessary)

a) Permit Condition Reference:

b) Emission Unit:

c) Alternative Requirement Begin and End Date:

D.) Facility Compliance Certification

NOTE: A responsible official, as defined in s. NR 400.02 (136), Wis. Adm. Code, must sign this compliance certification. Compliance certifications that are not signed by a responsible official will be returned as incomplete.

I have reviewed this facility's compliance status with respect to *ALL* air operation permit conditions for the reporting period specified in this compliance certification. Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Nilaksh Kothari
Signature of Responsible Official

Nilaksh Kothari

Typed or Printed Name of Signatory

General Manager

Title

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Date

For questions concerning compliance certification, contact your regional compliance engineer by phone, via email, or via facsimile.